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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

U.S. BANK, N.A., NOT INDIVIDUALLY
BUT SOLELY AS TRUSTEE FOR THE
HOLDERS OF THE BEAR STEARNS
ASSET BACKED SECURITIES I TRUST
2006-AC1, ASSET BACKED
CERTIFICATES, SERIES 2006-AC1, a
national association,

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a
Domestic Limited Liability Company,

Defendant.

SFR INVESTMENTS POOL 1, LLC, a
Nevada limited-liability company,

Counter/Cross Claimant,

vs.

U.S. BANK, N.A., NOT INDIVIDUALLY
BUT SOLELY AS TRUSTEE FOR THE
HOLDERS OF THE BEAR STEARNS
ASSET BACKED SECURITIES I TRUST
2006-AC1, ASSET BACKED
CERTIFICATES, SERIES 2006-AC1, a

Case No. 2:15-cv-01527-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR REPLY IN
SUPPORT OF MOTION TO DISMISS**

(Second Request)

national association; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., a Delaware corporation, as nominee for UNIVERSAL AMERICAN MORTGAGE COMPANY, LLC, a Florida limited liability company, its successors and assigns, and VICHEARITH KHUON, an individual,

Counter/Cross Defendants.

Pursuant to Local Rules 6-1 and 7-1, it is hereby stipulated by and between Counter-Defendant, Mortgage Electronic Registration Systems, Inc. ("MERS"), Defendant and Counter-Claimant SFR Investments Pool 1, LLC ("SFR"), and U.S. Bank, N.A., not Individually but Solely as Trustee for the Holders of the Bear Stearns Asset Backed Securities I Trust 2006-AC1, Asset Backed Certificates, Series 2006-AC1 ("U.S. Bank" and together with MERS and SFR, the "Parties"), by and through their counsel, as follows:

MERS filed a Motion to Dismiss SFR's Counterclaims on August 24, 2016 (ECF No. 34) with U.S. Bank joining the Motion to Dismiss on September 6, 2016 (ECF No. 39). Following a temporary stay of the litigation, the Parties agreed to a briefing schedule on MERS Motion to Dismiss in the Proposed Discovery Plan and Scheduling Order (ECF No. 42), setting March 21, 2017 as the time for MERS and U.S. Bank to reply in support of the Motion to Dismiss. The Court granted the Discovery Plan and Scheduling Order on February 8, 2017 (ECF No. 43).

SFR filed its Response to the Motion to Dismiss (ECF No. 45), Response to Joinder (ECF No. 46), and filed a Motion for Partial Summary Judgment (ECF No. 44) on March 7, 2017. Wells Fargo's response to the Motion for Partial Summary Judgment is currently due March 28, 2017.

The issues contained in SFR's Response and Partial Motion for Summary Judgment overlap. Based upon the similarity of the briefing the Parties stipulate, agree, and request the Court enter an order providing that MERS reply in support of its Motion to Dismiss, U.S. Bank's reply in support of the joinder to the motion to dismiss, and response to SFR's Partial Motion for Summary shall be due on the same date, **March 28, 2017**.

This is the Parties' second request for an extension of time in which to file the replies in support of the Motion to Dismiss, and is not intended to cause any delay or prejudice to any party.

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The Parties hereto agree to an extension in good faith due to the similarity of the issues in the Motion to Dismiss (ECF No. 34) and the Motion for Partial Summary Judgment (ECF No. 44). Additionally, the request is made in light of the litigation work load of the Parties, the excessive number of litigation matters currently in process for the Parties, and in order to provide time for the Parties to brief the issues relevant to this litigation which are constantly changing due to the high number of similar cases.

DATED this 16th day of March, 2017.

WRIGHT, FINLAY, & ZAK, LLP

By: /s/ Christopher A.J. Swift

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DATED this 16th day of March, 2017.

KIM GILBERT EBRON

By: /s/ Diana Cline Ebron

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 Attorneys for SFR Investments Pool 1, LLC

DATED this 16th day of March, 2017.

SNELL & WILMER L.L.P.

By: /s/ Wayne Klomp

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 Wayne Klomp, Esq.
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 Attorneys for Mortgage Electronic Registration
 Systems, Inc.

IT IS SO ORDERED.


 UNITED STATES DISTRICT JUDGE

DATED: March 17, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: March 16, 2017

/s/ Lara Taylor
Lara Taylor, Employee of Snell & Wilmer L.L.P.

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